

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
Nashville Division**

Phillip Lawson, <i>et al.</i> ,)	
)	
<i>Plaintiffs</i> ,)	
)	Case No. 3:24-cv-00538
v.)	
)	Chief Judge William J. Campbell, Jr.
Tre Hargett, in his official capacity as)	Magistrate Judge Alistair Newbern
Tennessee Secretary of State, <i>et al.</i>)	
)	
<i>Defendants.</i>)	

**NOTICE OF FILING SUPPLEMENTAL DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff League of Women Voters of Tennessee (“LWVTN”) hereby gives Notice of its Filing of a Supplemental Declaration in Support of Plaintiffs’ Motion for Preliminary Injunction (D.E. 43). As detailed in the Declaration, the laws being challenged in this case are—as predicted—being leveraged to intimidate voters from voting in the primary of their choice. In this instance, the Williamson County Republican Party is sending out mailers meant to prevent certain voters from voting the in the August primary of their choice, for which early voting has already started. The Supplemental Declaration is attached hereto as **Exhibit 1**.

Respectfully submitted,

/s/ John E. Haubenreich_____

John E. Haubenreich, BPR No. 029202
The Protect Democracy Project
2020 Pennsylvania Avenue NW, #163
Washington, DC 20006
Tel.: (202) 579-4582
john.haubenreich@protectdemocracy.org

Orion Danjuma (*pro hac vice*)

The Protect Democracy Project
82 Nassau St. #601
New York, NY 10038
Tel.: (202) 579-4582
orion.danjuma@protectdemocracy.org

Collin P. Wedel (*pro hac vice*)
Arsham Ali Askari (*pro hac vice*)
Christine Karaoglanian (*pro hac vice*)
Sidley Austin LLP
350 South Grand Avenue
Los Angeles, CA 90071
Tel.: (213) 896-6000
cwedel@sidley.com
aaliaskari@sidley.com
ckaraoglanian@sidley.com

Rebecca B. Shafer (*pro hac vice*)
Sidley Austin LLP
One South Dearborn
Chicago, IL 60603
Tel.: (312) 853-7000
rshafer@sidley.com

Jillian Sheridan Stonecipher (*pro hac vice*)
Sidley Austin LLP
1501 K Street NW
Washington, D.C. 20005
Tel.: (202) 736-8000
jstonecipher@sidley.com

*Counsel for Plaintiff League of Women Voters of
Tennessee*

R. Culver Schmid, BPR No. 011128
Baker, Donelson, Bearman, Caldwell &
Berkowitz, PC
265 Brookview Centre Way, Suite 600
Knoxville, TN 37919
Tel.: (865) 971-5103
cschmid@bakerdonelson.com

Gary Shockley, BPR No. 010104
Baker, Donelson, Bearman, Caldwell &
Berkowitz, PC
1600 West End Avenue, Suite 2000

Nashville, TN 37203
Tel.: (615) 726-5600
gshockley@bakerdonelson.com

Eric G. Osborne, BPR No. 029719
Christopher C. Sabis, BPR No. 030032
William L. Harbison, BPR No. 007012
Micah N. Bradley, BPR No. 038402
Frances W. Perkins, BPR No. 040534
Brettson J. Bauer, BPR No. 039289
Sherrard Roe Voigt & Harbison, PLC
1600 West End Avenue, Suite 1750
Nashville, TN 37203
eosborne@srvhlaw.com
csabis@srvhlaw.com
bharbison@srvhlaw.com
mbradley@srvhlaw.com
fperkins@srvhlaw.com

*Counsel for Plaintiffs Victor Ashe, Phillip
Lawson, Gabe Hart & James R. Palmer*

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2024 a true and exact copy of the foregoing Notice of Filing Supplemental Declaration in Support of Plaintiffs' Motion for Preliminary Injunction is being served via the Court's CM/ECF system and email upon the following:

Zachary L. Barker
Assistant Attorney General
Public Interest Division
P.O. Box 20207
Nashville, Tennessee 37202
Zachary.Barker@ag.tn.gov

Dawn Jordan
Special Counsel
Office of Tennessee Attorney General
P.O. Box 20207
Nashville, Tennessee 37202
Dawn.Jordan@ag.tn.gov

/s/ John E. Haubenreich
John E. Haubenreich